

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SHANE LAVIN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

Case No. 1:21-cv-03070-ARR-TAM

NOTICE OF MOTION OF MANUEL RODRIGUEZ FOR APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF LEAD COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Manuel Rodriguez (“Rodriguez”), by and through his counsel, will and does hereby move this Court, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for the entry of an Order: (1) appointing Rodriguez as Lead Plaintiff on behalf of a class consisting of all persons and entities other than the above-captioned defendants that purchased or otherwise acquired Virgin Galactic Holdings, Inc. securities between October 26, 2019 and April 30, 2021, both dates inclusive (the “Class”); and (2) approving proposed Lead Plaintiff’s selection of Pomerantz LLP as Lead Counsel for the Class.

Dated: July 27, 2021

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

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